

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

NATIONAL HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ARIZONA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ARKANSAS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, INDIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ILLINOIS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, LOUISIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, MOUNTAINEER PARK HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, NEBRASKA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, OKLAHOMA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, OREGON HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, PENNSYLVANIA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, AND WASHINGTON HORSEMAN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,

Plaintiffs,

v.

JERRY BLACK; KATRINA ADAMS; LEONARD COLEMAN, JR.; NANCY COX; JOSEPH DUNFORD; FRANK KEATING; KENNETH SCHANZER; the HORSERACING INTEGRITY AND SAFETY AUTHORITY, INC.; the FEDERAL TRADE COMMISSION; REBECCA KELLY SLAUGHTER, in her official capacity as Acting Chair of the Federal Trade Commission; ROHIT CHOPRA, in his official capacity as Commissioner of the Federal Trade Commission; NOAH JOSHUA PHILLIPS, in his official capacity as Commissioner of the Federal Trade Commission; and CHRISTINE S. WILSON, in her official capacity as Commissioner of the Federal Trade Commission,

Defendants.

No. 5:21-CV-00071-H

**PLAINTIFFS' CORPORATE DISCLOSURE STATEMENT**

Plaintiffs file this Corporate Disclosure Statement as required by Federal Rule of Civil Procedure 7.1 and certify as follows:

**A. National Horsemen's Benevolent and Protective Association ("National HBPA")**

1. National HBPA is a not-for-profit corporation with its principal place of business in Lexington, Kentucky
2. No Publicly held corporation owns 10 percent or more of National HBP's shares.

**B. Arizona Horsemen's Benevolent and Protective Association ("Arizona HBPA")**

1. Arizona HBPA is a not-for-profit corporation with its principal place of business in Phoenix, Arizona
2. No Publicly held corporation owns 10 percent or more of Arizona HBPA's shares.

**C. Arkansas Horsemen's Benevolent and Protective Association ("Arkansas HBPA")**

1. Arkansas HBPA is a not-for-profit corporation with its principal place of business in Hot Springs, Arkansas.
2. No Publicly held corporation owns 10 percent or more of Arkansas HBPA's shares.

**D. Indiana Horsemen's Benevolent and Protective Association ("Indiana HBPA")**

1. Indiana HBPA is a not-for-profit corporation with its principal place of business in Shelbyville, Indiana.
2. No Publicly held corporation owns 10 percent or more of Indiana HBPA's shares.

**E. Illinois Horsemen's Benevolent and Protective Association ("Illinois HBPA")**

1. Illinois HBPA is a not-for-profit corporation with its principal place of business in Caseyville, Illinois.
2. No Publicly held corporation owns 10 percent or more of Illinois HBPA's shares.

**F. Louisiana Horsemen's Benevolent and Protective Association ("Louisiana HBPA")**

1. Louisiana HBPA is a not-for-profit corporation with its principal place of business in New Orleans, Louisiana.

2. No Publicly held corporation owns 10 percent or more of Louisiana HBPA's shares.

**G. Mountaineer Park Horsemen's Benevolent and Protective Association ("Mountaineer Park HBPA")**

1. Mountaineer Park HBPA is a not-for-profit corporation with its principal place of business in Newell, West Virginia.
2. No Publicly held corporation owns 10 percent or more of Mountaineer Park HBPA's shares.

**H. Nebraska Horsemen's Benevolent and Protective Association ("Nebraska HBPA")**

1. Nebraska HBPA is a not-for-profit corporation with its principal place of business in Lincoln, Nebraska.
2. No Publicly held corporation owns 10 percent or more of Nebraska HBPA's shares.

**I. Oregon Horsemen's Benevolent and Protective Association ("Oregon HBPA")**

1. Oregon HBPA is a not-for-profit corporation with its principal place of business in Portland, Oregon.
2. No Publicly held corporation owns 10 percent or more of Oregon HBPA's shares.

**J. Pennsylvania Horsemen's Benevolent and Protective Association ("Pennsylvania HBPA")**

1. Pennsylvania HBPA is a not-for-profit corporation with its principal place of business in Grantville, Pennsylvania.
2. No Publicly held corporation owns 10 percent or more of Pennsylvania HBPA's shares.

**K. Oklahoma Horsemen's Benevolent and Protective Association ("Oklahoma HBPA")**

1. Oklahoma HBPA is a not-for-profit corporation with its principal place of business in Oklahoma City, Oklahoma.
2. No Publicly held corporation owns 10 percent or more of Oklahoma HBPA's shares.

**L. Washington Horseman's Benevolent and Protective Association ("Washington HBPA")**

1. Washington HBPA is a not-for-profit corporation with its principal place of business in Auburn, Washington.
2. No Publicly held corporation owns 10 percent or more Washington HBPA's shares.

Respectfully Submitted,

/s/ Fernando M. Bustos

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